

MEMO ENDORSED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TELECOM BUSINESS SOLUTION, LLC,
LATAM TOWERS, LLC, and AMLQ HOLDINGS
(CAY) LTD.,

Petitioners,

v.

TERRA TOWERS CORP. and TBS
MANAGEMENT, S.A.,

Respondents.

TERRA TOWERS CORP., TBS MANAGEMENT,
S.A., and DT HOLDINGS, INC.

Cross-Petitioners,

v.

TELECOM BUSINESS SOLUTION, LLC,
LATAM TOWERS, LLC, and AMLQ HOLDINGS
(CAY) LTD.,

Cross-Respondents.

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No. 22-cv-1761-LAK

**NOTICE OF MOTION FOR
LEAVE TO FILE UNDER SEAL**

PLEASE TAKE NOTICE that, UPON THE ACCOMPANYING Memorandum of Law in Support of Motion for Leave to File Under Seal, Respondents/Cross-Petitioners Telecom Towers Corp., TBS Management, S.A., and DT Holdings, Inc., by their attorneys, hereby move this Court pursuant to Federal Rule of Civil Procedure 5.2(d) for an Order granting leave to file under seal (1) Respondents' Memorandum of Law in Support of Motion for Leave to File Amended Cross-Petition to Vacate, (2) the Declaration of Juan J. Rodriguez in Support of Motion for Leave to File Amended Cross-Petition to Vacate, and (3) Exhibits 1, 2, 4, and 5 to the Rodriguez Declaration.


SO ORDERED

LEWIS A. KAPLAN, USDJ

8/29/22